

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

CONNECTICUT YANKEE ATOMIC)	
POWER COMPANY)	
)	
Plaintiff,)	
)	
v.)	No. 17-673C
)	
THE UNITED STATES)	
)	
Defendant.)	
<hr/>		
MAINE YANKEE ATOMIC)	
POWER COMPANY)	
)	
Plaintiff,)	
)	
v.)	No. 17-674C
)	
THE UNITED STATES)	
)	
Defendant.)	
<hr/>		
YANKEE ATOMIC ELECTRIC COMPANY)	
)	
Plaintiff,)	
)	
v.)	No. 17-675C
)	
THE UNITED STATES)	
)	
Defendant.)	
<hr/>		

**PLAINTIFFS’ OBJECTION TO DEFENDANT’S
MOTION TO STAY PROCEEDINGS**

Plaintiffs Connecticut Yankee Atomic Power Company (“Connecticut Yankee”), Maine Yankee Atomic Power Company (“Maine Yankee”), and Yankee Atomic Electric Company (“Yankee Atomic”) (collectively, “the Yankees”), object to the Government’s motion to stay these proceedings. The Yankees have worked diligently to prepare this case for trial on January 29, 2019. The Government, on the other hand, has consistently sought opportunities to delay the trial over the disputed claim, effectively holding hostage more than \$103 million that it admits owing as a result of its contract breach. The Yankees are unable to earn pre-judgment interest, even on the undisputed \$103 million, thus any delay imposes a significant penalty on these blameless plaintiffs.

For these reasons, even if the Court were inclined to grant defendant’s motion for a temporary stay, it should insist that the case be tried as scheduled on January 29, 2019, provided that the Government funding has been restored by January 25, 2019, and it should impose whatever compressed pretrial deadlines are needed to maintain the current trial schedule.

Dated: December 28, 2018

Respectfully submitted,

/s/ Robert H. Stier, Jr.

ROBERT H. STIER, JR.
PIERCE ATWOOD LLP
254 Commercial Street
Portland, ME 04101
rstier@pierceatwood.com
Telephone: (207) 791-1100
Facsimile: (207) 791-1350

Of Counsel:

LUCUS A. RITCHIE
lritchie@pierceatwood.com
PIERCE ATWOOD LLP

Attorneys for Plaintiffs

CERTIFICATE OF FILING

I certify that on this 28th day of December, 2018, a copy of this paper was filed electronically. I understand that notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Robert H. Stier, Jr.